

California Regional Water Quality Control Board  
San Diego Region

# Response to Comments Report

Tentative Order No. R9-2021-0205  
Amending

Order No. R9-2019-0167 as amended by Order No. R9-2020-0191  
NPDES No. CA0109347

Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton  
Southern Regional Tertiary Treatment Plant and  
Advanced Water Treatment Plant at Haybarn Canyon  
Discharge to the Pacific Ocean through the Oceanside Ocean Outfall

December 8, 2021



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

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San Diego Region

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## INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to written comments received from Mr. John Odermatt on Tentative Order No. R9-2021-0205, amending Order No. R9-2019-0167, as amended by Order No. R9-2020-0191, NPDES No. CA0109347, *Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton Southern Regional Tertiary Treatment Plant and Advanced Water Treatment Plant at Haybarn Canyon Discharge to the Pacific Ocean through the Oceanside Ocean Outfall* (Tentative Order). Mr. Odermatt's comments were received on September 28, 2021.

### **Comments and Responses**

Mr. Odermatt's summarized written comments and San Diego Water Board responses are set forth below. The section of the Tentative Order the comment pertains to is shown in parenthesis in each comment below.

## COMMENTS AND RESPONSES

### Comments from Mr. John Odermatt, email dated September 28, 2021

**1a. Mr. Odermatt Comment – Prohibition against tertiary treated wastewater into the outfall**

Mr. Odermatt requests that the San Diego Water Board include a prohibition against the discharging of tertiary-treated wastewater into the Oceanside Ocean Outfall in Order No. R9-2019-0167 because tertiary-treated wastewater should be recycled not wasted!

(Attachment 1 to Tentative Order No. R9-2021-0205: Section III)

#### **Response**

These comments are outside the scope of Order No. R9-2021-0205 and the related Notice of Opportunity to Comment. Order No. R9-2019-0167 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include the list of prohibitions or the type of wastewater discharged to the outfall. Therefore, the addition on a new prohibition or revisions to the type of wastewater discharged cannot be considered at this time.

**2a. Mr. Odermatt Comment – Reduce the permitted discharge volume by 10%**

Mr. Odermatt requests that the San Diego Water Board reduce the permitted flow in Order No. R9-2019-0167 by 10%; the 10% reduction should result in a diversion of that wastewater into recycled water production.

(Attachment 1 to Tentative Order No. R9-2021-0205: Section IV)

#### **Response**

These comments are outside the scope of Order No. R9-2021-0205 and the related Notice of Opportunity to Comment. Order No. R9-2019-0167 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include the permitted flow. Therefore, revisions to the type of permitted flow cannot be considered at this time.

**3a. Mr. Odermatt Comment – Requirement for report/plant to reduce ocean discharge**

Mr. Odermatt requests that the San Diego Water Board add a requirement for Marine Corps Base Camp Pendleton to provide a report or plan to future reduce the Marine Corps Base Camp Pendleton's discharge into the Oceanside Ocean Outfall by 40% by 2031.

(Attachment 1 to Tentative Order No. R9-2021-0205: Section VI.C.5)

**Response**

These comments are outside the scope of Order No. R9-2021-0205 and the related Notice of Opportunity to Comment. Order No. R9-2019-0167 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include a report or plan to make reduction on the discharges to the outfall. Therefore, the addition of this requirement to the amendments proposed by the Tentative Order cannot be considered at this time.

The San Diego Water Board's *Water Quality Control Plan for the San Diego Basin* (Basin Plan) does stipulate in Chapter 4 on Page 4-71 that water recycling should be carefully considered by persons proposing to discharge substantial quantities of once-used wastewater to the ocean particularly in a water short area where water is imported. It has long been a policy of the San Diego Water Board to encourage and promote water recycling while taking into consideration the need to protect beneficial uses of surface and ground waters and protect the public health. As a future initiative in keeping with this policy and the Basin Plan, the San Diego Water Board may consider requiring persons proposing a discharge of once-used wastewater into the ocean to 1) carefully analyze as an alternative, or partial alternative, the feasibility of recycling the wastewater for a beneficial use in lieu of ocean disposal and to 2) include the analysis in the report of waste discharge permit application.